

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

**Jul 08, 2024**

SEAN F. McAVOY, CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

J'LOVFORTE JEROME JOE,

Defendant.

No. 1:22-CR-02095-SAB-1

**PROTECTIVE ORDER  
REGARDING DISCOVERY AND  
IDENTIFICATION OF MINOR  
VICTIM OR WITNESS**

Pending before the Court is the United States' Unopposed Motion for Discovery Protective Order, ECF No. 87. Defendant is represented by Alex B. Hernandez, III. The Government is represented by Michael D. Murphy. The motion was considered without oral argument.

The Court reviewed the motion pursuant to 18 U.S.C. §§ 3509 and 3771. Upon review, and being fully informed, the Court finds good cause and grants the unopposed motion.

Accordingly, **IT IS HEREBY ORDERED:**

1. The United States' Unopposed Motion for Discovery Protective Order, ECF No. 87, is **GRANTED**.

2. The privacy protection measures mandated by 18 U.S.C. § 3509(d), which apply when a case involves a person under the age of eighteen years who is

**PROTECTIVE ORDER REGARDING DISCOVERY AND  
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1 alleged to be a victim of a crime of sexual exploitation, or a witness to a crime  
2 committed against another person, apply to this case.

3 3. All persons acting in this case in a capacity described in 18 U.S.C. §  
4 3509(d)(1)(B), shall:

- 5 a. Keep all documents that disclose the names, identities, or any other  
6 information concerning minors in a secure place to which no person  
7 who does not have reason to know their contents has access;
- 8 b. Disclose such documents or the information in them that concerns  
9 minors only to persons who, by reason of their participation in the  
10 proceeding, have reason to know such information;
- 11 c. Not permit Defendant himself to review discovery outside the  
12 presence of defense counsel or a defense investigator;
- 13 d. Not permit Defendant to keep discovery in his own possession outside  
14 the presence of defense counsel or a defense investigator; and
- 15 e. Not permit Defendant to keep, copy, or record the identities of any  
16 minor or victim identified in discovery in this case.

17 4. All papers to be filed in Court that disclose the names or any  
18 information identifying or concerning minors shall be filed under seal without  
19 necessity of obtaining a Court order, and that the person who makes the filing shall  
20 submit to the Clerk of the Court:

- 21 a. The complete paper to be kept under seal; and
- 22 b. The paper with the portions of it that disclose the names or other  
23 information identifying or concerning children redacted, to be placed  
24 in the public record.

25 5. The parties and the witnesses shall not disclose minors' identities  
26 during any proceedings connected with this case. The parties and witnesses will  
27 refer to the alleged minor victims or witnesses only by using agreed-upon initials or  
28 pseudonyms (e.g., "Minor Victim 1"), rather than their bona fide names, in

1 motions practice, opening statements, during the presentation of evidence, in  
2 closing arguments, and during sentencing.

3 6. The Government may produce discovery to the defense that discloses  
4 the identity and images of the alleged minor victim or witness in this case, in order  
5 to comply with the Government's discovery obligations. Defendant, the defense  
6 team, Defendant's attorneys and investigators, and all of their externs, employees,  
7 and/or staff members, shall keep this information confidential as set forth above.

8 7. This Order shall apply to any attorneys who subsequently become  
9 counsel of record, without the need to renew or alter the Order.

10 8. This Order shall apply to the personal identifying information and  
11 images of any minors who are identified over the course of the case, whether or not  
12 such minors are known to the Government and/or Defendant at the time the Order  
13 is entered by the Court.

14 **IT IS SO ORDERED.** The District Court Clerk is hereby directed to enter  
15 this Order and provide copies to counsel.

16 **DATED** this 8th day of July 2024.



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22 Stanley A. Bastian  
23 Chief United States District Judge  
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